

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**Foreign Economic Industrial Bank Limited,
“Vneshprombank” Ltd.,**
Debtor in a Foreign Proceeding.

Chapter 15
Case No. **16-13534** (MG)

In re:

Larisa Markus,
Debtor in a Foreign Proceeding.

Chapter 15
Case No. **19-10096** (MG)

**STIPULATION
CONCERNING PAYMENT OF
OUTSTANDING ATTORNEYS’ FEES, COSTS AND EXPENSES**

THIS STIPULATION concerning payment of attorneys’ fees, costs and expenses is entered into by and between Marks & Sokolov, LLC (“Marks”) and M&S Law, LLC (“MS Law”) (together, “Law Firms”), on the one hand, and counsel on behalf of: (i) Foreign Economic Industrial Bank, by the State Corporation “Deposit Insurance Agency” (“DIA”) in its Capacity as Trustee and Foreign Representative for the Debtor Vneshprombank (“Bank Trustee”); and (ii) Yuri Vladimirovich Rozhkov in his Capacity as Trustee and Foreign Representative for the Debtor Larisa Markus (“LM Trustee”) (together “Trustees”), on the other hand.

WHEREAS, Marks & Sokolov, LLC (“Marks”) and M&S Law, LLC (“MS Law”) (together, “Law Firms”) were counsel for the Trustees from 2016 through 2021 in the above-captioned related Chapter 15 proceedings; and

WHEREAS, the parties now desire to resolve the Law Firms’ outstanding attorneys’ fees, costs and expenses;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, as follows:

1. The Trustees, through their funder, BAGT, hereby agree to pay Forty Thousand

(\$40,000.00) U.S. Dollars (“Final Payment”) to the Law Firms in full and final payment of any and all claims of the Law Firms concerning the Trustees’ liability for attorneys’ fees, costs and expenses.

2. In consideration for the resolution of this dispute, the Law Firms shall forever release and discharge the Trustees, as well as their successors or assigns, from any and all actions, causes of action, suits, debts, sums of money, damages, claims and demands, in law and equity, including any and all claims for attorneys’ fees, costs and expenses, arising from or related to the services provided by and payments to the Law Firms from September 1, 2016 through September 18, 2021, in the above-captioned actions.

3. In consideration for the resolution of this dispute, the Trustees shall forever release and discharge the Law Firms, as well as their members, associates, employees, consultants, successors or assigns, from any and all actions, causes of action, suits, debts, sums of money, damages, claims and demands, in law and equity, including any and all claims for attorneys’ fees, costs and expenses, arising from or related to the services provided by and payments to the Law Firms from September 1, 2016 through September 18, 2021, in the above-captioned actions.

4. Pending the receipt of payment of the \$40,000 from BAGT and executed releases between the Trustees and the Law Firms, the time period for the Law Firms to respond to the motion of Yuri Rozhkov, the Chapter 15 trustee for Larisa Markus, to transfer funds from Marks’ IOLTA account (*Markus* ECF 374) shall be EXTENDED until Friday, September 24 at 5:00 p.m.

Dated: September 21, 2021
New York, New York

<u>/s/ Bruce S. Marks</u> Bruce S. Marks MARKS & SOKOLOV, LLC	<u>/s/ Stephen B. Selbst</u> Stephen B. Selbst HERRICK, FEINSTEIN LLP
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1835 Market Street, 17th Floor Philadelphia, PA 19103 (215) 569-8901 marks@mslegal.com <i>For</i> <i>Marks & Sokolov, LLC and</i> <i>M&S Law, LLC</i>	Two Park Avenue New York, NY 10016 (215) 592-1400 sselbst@herrick.com <i>Counsel for:</i> <i><u>Bank</u>: Attorneys for State Corporation</i> <i>“Deposit Insurance Agency”</i> <i>in its Capacity as Trustee and Foreign</i> <i>Representative for the Debtor</i> <i><u>Markus</u>: Attorneys for Yuri Vladimirovich</i> <i>Rozhkov in his Capacity as Trustee and</i> <i>Foreign Representative for the Debtor</i>
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SO ORDERED:

UNITED STATES BANKRUPTCY JUDGE